

ZWAPGRID PRIVACY POLICY

1. INTRODUCTION

- 1.1 Zwapgrid AB, reg. no. 559079-0100, ("Zwapgrid") provides efficient and secure data streaming between systems, customers and partners (the "Services"). The Services are subject to Zwapgrid's general terms and conditions for the Services (the "Terms and Conditions").
- 1.2 When providing the Services, Zwapgrid may receive and process sensitive information such as personal data. This Privacy Policy (the "Privacy Policy") governs Zwapgrid's collection and treatment of such sensitive information. The Privacy Policy has been prepared in accordance with the provisions of EU Regulation (EU) 2016/679 (the "Data Protection Regulation") and Swedish national laws and regulations. The Privacy Policy forms an integral part of the Terms and Conditions.
- 1.3 Any words beginning with a capital letter in this Privacy Policy shall have the same meaning as in the Terms and Conditions.

2. PERSONAL DATA PROCESSED ON BEHALF OF CUSTOMER

- 2.1 The Customer is the controller and Zwapgrid is the processor of Personal Data processed through and by the Services on behalf of the Customer.
- 2.2 The Customer has the full and exclusive responsibility for ensuring that the Personal Data set out in paragraph 2.1 has been obtained in accordance with applicable law and may be processed through and by the Services.
- 2.3 The Customer also has the full and exclusive responsibility for obtaining consent to transfer of Personal Data set out in paragraph 2.1 to third parties. Zwapgrid will transmit such information to recipients in non-EEA countries only if there is an adequate level of protection in the recipient country for personal information or if there are special safeguards for protecting the data and the rights of the data subjects.
- 2.4 Zwapgrid will process Personal Data set out in paragraph 2.1 in accordance with applicable law. Zwapgrid will follow Customer instructions and guidelines provided that these are in accordance with applicable law.

3. PERSONAL DATA COLLECTED AND PROCESSED BY ZWAPGRID

- 3.1 Zwapgrid is the controller of Personal Data collected and processed by Zwapgrid. Personal Data collected and processed by Zwapgrid may be personal information such as name, birth date, personal identification number such as social security, addresses, e-mail, or mobile phone number or geographic information and device information such as IP address, language settings, browser settings, time zone, operating system, platform and screen resolution.
- 3.2 Zwapgrid collects and processes Personal Data for the following purposes:
 - (a) To provide the Services and to ensure that the Services are well functioning and secure to use;
 - (b) In order to fulfil other contractual obligations towards Customers;
 - (c) In order to communicate (by e-mail, mail, text messages or otherwise) with the users of its Services;
 - (d) To develop and improve the Services;
 - (e) For accounting and marketing purposes;
 - (f) For business development purposes, such as development of new services and functions;
 - (g) To fulfil any reporting or disclosure obligation required by applicable law, regulation or ruling by competent authorities; or
 - (h) Other legitimate purposes.

- 3.3 All Personal Data collected and processed by Zwapgrid is protected against unauthorized access and disclosure through encryption and other technical measures.

4. TRANSFER OF PERSONAL DATA; DISCLOSURE

- 4.1 Zwapgrid may disclose Personal Data to others if required by law or if necessary, to prevent, detect and prosecute illegal or suspected illegal activities, to prevent improper use of the Services or in response to a legal action or to enforce Zwapgrid's rights and requirements.
- 4.2 Without prejudice to what otherwise follows from this Privacy Policy, Zwapgrid may use or disclose information, including Personal Data, that cannot be linked to a specific individual. Zwapgrid may also use or disclose such information for marketing purposes, e.g. to show trends in how the Services are by Customers.

5. STORAGE

- 5.1 Zwapgrid stores Personal Data to the extent necessary to fulfil its contractual obligations and applicable legal requirements. Personal Data will be stored only for as long as necessary to fulfill the purposes described in this Privacy Policy and never beyond the legal or other regulatory time lines
- 5.2 Zwapgrid reviews stored Personal Data regularly.

6. THE RIGHT TO ACCESS TO AND CORRECTION, UPDATES AND DELETION OF PERSONAL DATA

- 6.1 Any individual whose Personal Data is processed by Zwapgrid is entitled to access these Personal Data. The information can be obtained from Zwapgrid free of charge once a year.
- 6.2 Any individual whose Personal Data is processed by Zwapgrid may at any time request the Personal Data of the Zwapgrid to be updated or corrected. The individual may also request that the processing of personal data be limited (i.e. that Zwapgrid may not process all Personal Data or that Personal Data may be processed for certain purposes only).
- 6.3 Any individual whose Personal Data is processed by Zwapgrid may request the deletion of his/her Personal Data.
- 6.4 Any individual whose Personal Data is processed by Zwapgrid may request that Personal Data is transferred to another controller.
- 6.5 Notwithstanding the above, Zwapgrid may deny access to Personal Data or deny to update, correct, delete or transfer Personal Data, if Zwapgrid deems that the request is unreasonably or if the request is repeated an unreasonable number of times, requires disproportionate technical work (for example, the development of a new system or substantial changes to existing practices), risks the privacy of others or is very impractical. Updates, corrections, deletions or transfers may also be refused if Zwapgrid is required by law to retain the Personal Data as it is. In such cases, Personal Data can often be blocked instead. If Personal Data is deleted, changed or transferred, Zwapgrid cannot guarantee the proper function of the Services.
- 6.6 Requests under this Section 6 shall be made in writing to Zwapgrid (details below).

7. COMPLIANCE AND CO-OPERATION WITH AUTHORITIES

- 7.1 Zwapgrid evaluates and documents its personal data work, including compliance with this Privacy Policy, on an ongoing basis.
- 7.2 Zwapgrid will follow up any written complaints directly. If the matter cannot be resolved directly with the individual(s) concerned, Zwapgrid will co-operate with appropriate authorities, including data protection authorities, to resolve any complaints regarding personal data.
- 7.3 Zwapgrid reports any incidents of accidental or unlawful destruction, loss or alteration of Personal Data processed by Zwapgrid or incidents that result in unauthorised disclosure of or unauthorised access to Personal Data. Such notification will be made to the Swedish Data Protection Authority as soon as possible and not later than 72 hours after the Zwapgrid has become aware of the incident unless. However, if there is no risk of violating the rights of natural persons, Zwapgrid may refrain from reporting.

8. COOKIES AND OTHER TECHNICAL MEASURES

- 8.1 The Services may use "cookies" and other technologies, such as GIFs and web beacons. Customers and users may at any time choose to decline the use of such technologies on its device and to delete any cookie and technology files placed on the device. If so, Zwapgrid cannot guarantee that the Services will function as intended.
- 8.2 Zwapgrid also collects information automatically to store it in log files. The information includes, for example, Internet Protocol (IP) addresses, web browsers and languages, Internet service provider (ISP), referral, reference and exits sites and applications, operating system, date or time stamp, and click flow data. This information is used to understand and analyse trends and user behaviour, administering the website and App(s), improving the Services and collecting information about users at an aggregated level. Zwapgrid may also use the information in marketing and advertising services.

9. UPDATES OF INTEGRITY POLICY

- 9.1 Zwapgrid may at any time update this Privacy Policy to reflect changes in the way Zwapgrid processes personal information. If material changes require the consent of the customer/individual, the Zwapgrid will notify users in advance. The latest version of the Privacy Policy will be announced on the home page.
- 9.2 For any questions about this privacy policy or any other contact with respect to the privacy policy, please contact Zwapgrid at info@zwapgrid.com.